

February 7, 2023

The Honorable Paul G. Gardephe
United States District Court, Southern District of New York
40 Foley Square, Room 2204
New York, New York 10007

Re: *Wells Fargo Trust Co., N.A. as Owner Trustee v. Fast Colombia S.A.S.*
(d/b/a VivaColombia), Civil Action No. 23 Civ. 603

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Dear Judge Gardephe:

We represent Plaintiff Wells Fargo Trust Company, National Association, not in its individual capacity but solely in its capacity as Owner Trustee (“Plaintiff”), and write to seek the Court’s permission to file the attached corrected Complaint, which includes six exhibits that were inadvertently omitted when we filed the original Complaint on January 24, 2023. *See* ECF No. 1. The six exhibits were described in relevant part and were incorporated by reference in the original Complaint, and Defendant Fast Colombia S.A.S. (d/b/a VivaColombia) (“Defendant”) and/or its agents already possess these documents. There are no changes to the actual pleading, and we respectfully ask the Court to deem the attached corrected Complaint, including its exhibits, as the operative Complaint in this action. With Your Honor’s permission, we will then re-file the Complaint pursuant to the clerk’s instructions in today’s docket notice.

We thank the Court for its consideration.

Respectfully submitted,

/s/ Jackson Herndon

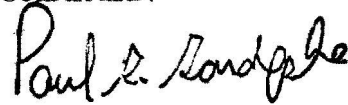
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MEMO ENDORSED:

Plaintiff will file an Amended
Complaint by **February 16, 2023**.

SO ORDERED.



Paul G. Gardephe
United States District Judge

Enclosure

Dated: February 10, 2023